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Attorneys Defendants Monmouth County
Board of Chosen Freeholders, et, al.

**UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF NEW JERSEY**

JOHN CURLEY,

Plaintiff,

-vs-

MONMOUTH COUNTY BOARD OF CHOSEN
FREEHOLDERS; SERENA DIMASO, in her
individual and official capacity as
Monmouth County Chosen Freeholder;
THOMAS ARNONE, in his individual
and official capacity as Monmouth
County Chosen Freeholder; GARY
RICH, in his individual and
official capacity as Monmouth
County Chosen Freeholder; LILLIAN
BURY, in her individual and
official capacity as Monmouth
County Chosen Freeholder; MICHAEL
FITZGERALD, ESQ., in his individual
and official capacity as County
Counsel, and TERI O'CONNOR, in her
individual and official capacity as
County Administrator,

Defendant(s).

**CIVIL ACTION NO.:
3:17-12300 (BRM) (TJB)**

CIVIL ACTION

NOTICE OF SPECIAL APPEARANCE

Notice is hereby given of the Special Appearance of Jonathan Testa, Esq. of the firm O'Donnell McCord, P.C., as Special Counsel on behalf of Defendants Monmouth County Board of Chosen Freeholders; Serena DiMaso, in her individual and official capacity as Monmouth County Chosen Freeholder; Thomas Arnone, in his individual and official capacity as Monmouth County Chosen Freeholder; Gary Rich, in his individual and official capacity as Monmouth County Chosen Freeholder; Lillian Bury, in her individual and official capacity as Monmouth County Chosen Freeholder; Michael Fitzgerald, Esq., in his individual and official capacity as County Counsel; and Teri O'Connor, in her individual and official capacity as County Administrator (hereinafter collectively referred to as "County Defendants").

This appearance is deemed a Special Appearance, and is being filed for the limited purposes of applying to the Court on behalf of the County Defendants for: (1) an automatic extension of time for the County Defendants to file an Answer, Motion, or otherwise Reply to Plaintiff John Curley's First Amended Complaint (See ECF No. 7) pursuant to L. Civ. R. 6.1(b); and (2) an automatic extension of time for the County Defendants to file opposition to Plaintiff's Motion for Contempt (See ECF Nos. 8-9) pursuant to L. Civ. R. 7.1(d) (5).

This "Special Appearance" shall not be construed as a general appearance on behalf of the County Defendants. With the exception

of service and the sufficiency of service of process, the County Defendants do not waive and hereby reserve the right to assert any and all other available defenses, affirmative or otherwise, including but not limited those defenses relevant to improper venue and lack of personal jurisdiction.

O'DONNELL MCCORD, P.C.

s/ Jonathan Testa
Jonathan Testa, Esq.
Attorneys for Defendants
Monmouth County Board of Chosen
Freeholders, et al.,

Dated: December 29, 2017